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BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

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WILLIAM A. MUNDELL
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Commissioner

**IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF
1996**

Docket No. T-00000A-97-0238

**QWEST'S POST-WORKSHOP
BRIEF REGARDING CGE&Y's
DATA RECONCILIATION
REPORT**

Qwest Corporation submits this brief regarding issues Cap Gemini Ernst & Young's (CGE&Y) draft Data Reconciliation Report for the Functionality Test Results.

CGE&Y's data reconciliation effort complies with Section 7.3.3 of the Test Standards Document, which provides that the Test Administrator was to compare the data collected by the Pseudo-CLEC, Hewlett-Packard Company (HP), to the data reported by Qwest. CGE&Y's draft Data Reconciliation Report indicates that it did exactly that. After comparing the data produced by Qwest to the data collected by HP, CGE&Y issued 19 Incident Work Orders reporting issues it discovered during its data reconciliation effort.

AT&T and WorldCom claim that CGE&Y did not follow to the letter the TSD. Contrary to AT&T and WorldCom's assertions, CGE&Y did exactly what it should have. At the workshop, Bob Dryzgula testified that CGE&Y compared each element of the data reported by Qwest to determine if HP reported the same information for that element:

14 If the PID can be calculated from the
15 Pseudo-CLEC data and it has been reconciled and all
16 the data elements contained therein match that of the
17 ad hoc data, it really is no matter. It's a matter of

18 semantics at that point. If there were differences,
19 on the other hand, we would have to either reconcile
20 them or defer to the Pseudo-CLEC data, but all of
21 those differences we are attempting -- have attempted
22 and are still attempting in some cases due to open
23 IWOs to explain. . .

14 **Wherever there are data elements that are**
15 **common, they were reconciled.**

(Transcript, December 12, 2002, p. 144-5, emphasis added).

AT&T and WorldCom's principal complaint is that CGE&Y should not have compared the actual data elements, but the sums of those data elements. AT&T and WorldCom's claims are ones of formality, not of substance. As an example, consider the example where Qwest is reporting results of a measure (which we will call C), which is made up of two elements (which we will call A + B), and HP is reporting the same measure and elements (which we will call F, D and E). In other words:

- Qwest is reporting $A + B = C$, and
- HP is reporting $D + E = F$.

In this example, CGE&Y verified that each element reported by Qwest was the same as each element reported by HP. In other words, CGE&Y verified that $A = E$ and $B = D$. AT&T and WorldCom are not satisfied by this approach, they assert that if CGE&Y followed the TSD, it would have added the elements first and then compared the results. In the example above, AT&T and WorldCom assert that CGE&Y should have examined whether $C = F$, not whether $A = D$ and $B = E$.

AT&T and WorldCom's complaint elevates form over function. Anyone with a rudimentary understanding of algebra would understand that:

- If $A + B = C$ and $D + E = F$
- And $A = D$ and $B = E$

- THEN C = F.

As this example demonstrates, the fact that CGE&Y compared the elements that made up measures, rather than the sums of those elements, makes no difference. The result is the same – the test verified that the data reported by Qwest is accurate.

The remaining complaints of AT&T and WorldCom result from the fact that they do not accept reasonable solutions developed by CGE&Y to address difficulties in collecting data. The most prominent example of this situation is CGE&Y's undertaking to determine whether Qwest was properly reporting customer caused delays, CGE&Y contacted each friendly customer following each installation. If the customer reported any problem, CGE&Y made a note of the problem reported:

24 MR. DRYZGULA: [T]he methodology employed during this
25 test used our so-called friendlies customers. And as
1 a matter of course, post order completion we followed
2 up with a telephone call to the friendly, asking if
3 the order had been provisioned and whether they had
4 any complaints or not.

(Transcript, December 12, 2002, p. 590-91, emphasis added).

CGE&Y then compared those notes to the facts reported by Qwest. If Qwest reported a customer-caused delay, and CGE&Y noted that the customer reported a Qwest-caused delay, then CGE&Y would have reported a problem:

2 MR. DRYZGULA: On the other hand, we always followed up on
3 every install with a follow-up call, and we would have
4 heard from the customer if the service wasn't
5 installed or wasn't installed when it was supposed to.

Using this method, CGE&Y did not uncover any such problems with Qwest's use of the customer not ready code:

14 MS. HAYSLIP: First off, in the Functionality

15 Test, we did have 120 customer not readies, and we
16 found no evidence through the call logs with the
17 friendlies that they were miscoded and the customer
18 was indeed ready and Qwest failed to provision the
19 service as required on the due date.

(Transcript, December 12, 2002, p. 596).

Manual rejects is a similar example. CGE&Y testified that while HP did not have a record of seven rejects, CGE&Y verified through evidence produced by Qwest that those messages were sent:

21 MR. DRYZGULA: The sentence says that it
22 leaves seven notifications for manual rejects
23 regarding which Qwest claims to have sent the
24 notification and Pseudo-CLEC claims not to have any
25 record. Well, the Pseudo-CLEC had no record, but we
1 did go back to Qwest, and they did produce screen
2 prints of this seven notifications. So, yes, we were
3 unable to reconcile because there was nothing to
4 reconcile to, but we were able to validate Qwest's
5 claim.

(Transcript, December 12, 2002, p. 624-25).

AT&T and WorldCom asserted several similar claims during the workshop. For each situation, CGE&Y explained the reasonable steps it took to verify that the numbers reported by Qwest were accurate. CGE&Y used its professional judgment to verify Qwest's data, and AT&T and WorldCom should not be allowed to nitpick CGE&Y's methods. If the methods the testers used were reasonable – and they were – the results of the tests can be considered valid.

IV. CONCLUSION

By the time this process is over, there should be no question that the information being reported by Qwest is accurate. Qwest has undergone two complete and thorough audits, one by CGE&Y and one by Liberty Consulting. In addition, data reconciliations are being conducted by CGE&Y in the Arizona OSS Test, KPMG in the ROC OSS Test and Liberty Consulting.

It is true that in each of those efforts, problems were found, as will happen in any thorough audit. The important thing is that Qwest's numbers have been thoroughly audited, and when problems were found, Qwest fixed them. The Arizona Corporation Commission can rely upon the results of these audits, and the numbers Qwest is reporting, when it makes its recommendation to the FCC.

Dated this 18th day of January, 2002.

Respectfully submitted,

QWEST CORPORATION

By: 

Timothy Berg
Theresa Dwyer
FENNEMORE CRAIG, P.C.
3003 North Central Ave., Suite 2600
Phoenix, Arizona 85012-2913
(602) 916-5421
(602) 916-5999 (facsimile)

Andrew Crain
Qwest Corporation
1801 California Street, Suite 4900
Denver, Colorado 80202
(303) 672-2926

Attorneys for Qwest Corporation

**ORIGINAL and 12 copies of the foregoing filed
this 18th day of January, 2002 with:**

Docket Control
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

**COPY of the foregoing hand-delivered
this 18th day of January, 2002, to:**

Maureen A. Scott
Legal Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

Ernest G. Johnson, Director
Utilities Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

Lyn Farmer, Chief Administrative Law Judge
Hearing Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington
Phoenix, AZ 85007

Caroline Butler
Legal Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

**COPY of the foregoing mailed/e-mailed
this 17th day of January, 2002, to:**

Eric S. Heath
SPRINT COMMUNICATIONS CO.
100 Spear Street, Suite 930
San Francisco, CA 94105

Thomas Campbell
Lewis & Roca
40 N. Central Ave.

Phoenix, AZ 85004

Joan S. Burke
Osborn Maledon, P.A.
2929 N. Central Ave., 21st Floor
PO Box 36379
Phoenix, AZ 85067-6379

Thomas F. Dixon
Worldcom, Inc.
707 17th Street # 3900
Denver, CO 80202

Scott S. Wakefield
Residential Utility Consumer Office
2828 North Central Ave., Suite 1200
Phoenix, AZ 85004

Michael M. Grant
Todd C. Wiley
Gallagher & Kennedy
2575 E. Camelback Rd.
Phoenix, AZ 85016-9225

Michael Patten
Roshka Heyman & DeWulf
400 East Van Buren Street
Suite 900
Phoenix, AZ 85004-3906

Bradley S Carroll
Cox Communications
20401 North 29th Avenue
Phoenix, AZ 85027-3148
Daniel Waggoner
Davis, Wright & Tremaine
2600 Century Square
1501 Fourth Avenue
Seattle, WA 98101-1688

Traci Grundon
Davis Wright & Tremaine
1300 S.W. Fifth Avenue
Portland, OR 97201

Richard S. Wolters

Maria Arias-Chapleau
AT&T Law Department
1875 Lawrence Street # 1575
Denver, CO 80202

Gregory Hoffman
AT&T
795 Folsom Street
Room 2159
San Francisco, CA 94107-1243

David Kaufman
e.Spire Communications, Inc.
343 W. Manhattan Street
Santa Fe, NM 87501

Alaine Miller
XO Communications, Inc.
500 108th Ave. NE, Suite 2200
Bellevue, WA 98004

Diane Bacon, Legislative Director
Communications Workers of America
5818 N. 7th St., Suite 206
Phoenix, Arizona 85014-5811

Philip A. Doherty
545 South Prospect Street, Suite 22
Burlington, VT 05401

W. Hagood Bellinger
5312 Trowbridge Drive
Dunwoody, GA 30338
Joyce Hundley
U.S. Dept. of Justice
Antitrust Division
1401 H Street, NW, # 8000
Washington, DC 20530

Andrew O. Isar
Telecommunications Resellers Association
4312 92nd Ave., NW
Gig Harbor, WA 98335

Raymond S. Heyman
Two Arizona Center

400 North Van Buren Street, Suite 800
Phoenix, AZ 85004-3906

Thomas L. Mumaw
Snell & Wilmer
One Arizona Center
Phoenix, AZ 85004-0001

Charles Kallenbach
American Communications Services, Inc.
131 National Business Parkway
Annapolis Junction, MD 20701

Gena Doyscher
Global Crossing Services, Inc.
1221 Nicollet Mall
Minneapolis, MN 55403-2420

Andrea Harris, Senior Manager
Allegiance Telecom, Inc. of Arizona
2101 Webster, Ste. 1580
Oakland, CA 94612

Gary L. Lane, Esq.
6902 East 1st Street, Suite 201
Scottsdale, AZ 85251
Steve Strickland
SBC Telecom, Inc.
300 Convent, 18th Floor
San Antonio, Texas 78201

M. Andrew Andrade
Tess Communications, Inc.
5261 S. Quebec Street Ste. 150
Greenwood Village, CO 80111

Richard Sampson
Z-Tel Communications, Inc.
601 S. Harbour Island, Ste. 220
Tampa, Florida 33602

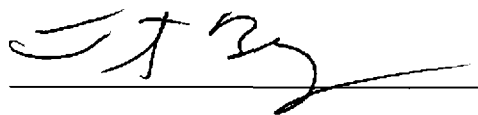
Megan Doberneck
Covad Communications Company
7901 Lowry Boulevard

Denver, Colorado 80230

Richard P. Kolb
Vice President-Regulatory Affairs
OnePoint Communications
Two Conway Park
150 Field Drive, Suite 300
Lake Forest, Illinois 60045

Janet Napolitano, Attorney General
Office of the Attorney General
1275 West Washington
Phoenix, AZ 85007

Steven J. Duffy
Ridge & Isaacson, PC
3101 North Central Avenue
Suite 1090
Phoenix, AZ 85012

A handwritten signature in black ink, appearing to read "S. Duffy", is written over a horizontal line.

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